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## Via ECF

March 1, 2024

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge United States District Court- District of NJ Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street, Court Room 7W Trenton, NJ 08608

Re: In re: Johnson & Johnson Talcum Powder Products

Marketing, Sales Practices and Products Liability Litigation 
MDL 2738

Dear Magistrate Judge Singh:

Pursuant to the Case Management Order entered on February 13, 2024 (ECF No. 29032), outlining procedures for adjudication of cases where the plaintiff fails to comply with the Court Orders on case specific fact discovery and the Plaintiff Profile Form ("PPF"), please see the attached list of non-compliant cases. Counsel for these plaintiffs have received notice through MDL Centrality (if they are registered there as required by Court Orders) and e-mail (whether registered or not).

In accordance with the above noted CMO, Defendants will file an order to show cause on May 1, 2024, should any of these noted matters continue to fail to provide the overdue discovery.

Respectfully,

Thank you for your consideration of these matters.

/s/ Susan M. Sharko	
Susan M. Sharko	

FAEGRE DRINKER BIDDLE & REATH LLP

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SMS/scg

Encl: (1)

Cc: Leigh O'Dell, Esq. (via e-mail)

Michelle Parfitt, Esq., (via e-mail)

All counsel of record (via ECF)

# Case 3:16-md-02738-MAS-RLS Document 29168 Filed 03/01/24 Page 3 of 8 PageID: 174114 March 1, 2024, Cases Deficient in Serving Plaintiff Profile Forms

Number	Case Name	Plaintiff Firm(s)	Current Cause #
1	Flowe, Sherry	Ashcraft & Gerel	3:17-cv-10963
2	Burns, Margaret	Ashcraft & Gerel	3:17-cv-11259
3	Gaspard, Ethel	Ashcraft & Gerel	3:17-cv-11274
4	Scott, Shilinda	Ashcraft & Gerel	3:17-cv-11283
5	Lumas, Tanashiska	Barrett Law Group, P.A.	3:16-cv-06694
6	Hayden, Theresa	Barrett Law Group, P.A.	3:17-cv-07000
7	Smith, Viola	Barrett Law Group, P.A.	3:17-cv-07021
8	Graham, Justin	Barrett Law Group, P.A.	3:17-cv-07186
9	Keys-Chavis, Edna	Barrett Law Group, P.A.	3:17-cv-07370
10	Kinsel, Patsy	Barrett Law Group, P.A.	3:17-cv-09059
11	Yost, Betty A	Barrett Law Group, P.A.	3:17-cv-12512
12	White, Gasecener	Barrett Law Group, P.A.	3:17-cv-12598
13	Rico, Amy M.	Baum, Hedlund, Aristei & Goldman, P.C.	3:17-cv-11342
14	Darling, Kimberly	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-05480
15	Rutkowaki, Roxanne	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-05483
16	Martinez, Larkin	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-06060
17	Schulz, Tom	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-07237
18	Stanek, Pamela	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-07576
19	Parsons, Thurman	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08300
20	Preiss, Melissa	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08301
21	Spencer, Victoria	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08313
22	Davis, Thomas	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08512
23	Bradley, Monica	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08513
24	Constant, Katherine	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08568
25	Hall, Debra	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08616
26	Hammer-Allen, Michelle	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08624
27	Carre Meliana	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08654
28	Carr, Melissa	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08661
29	Hatch, Patricia	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08686
30	Thomas, Mateline	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08691
31	Shepherd, Janet	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08704
32	Ayo, Evelyn	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08860
33	Crollard, Shelly	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08868
34	Bottoms, Aledda	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08919

# Case 3:16-md-02738-MAS-RLS Document 29168 Filed 03/01/24 Page 4 of 8 PageID: 174115 March 1, 2024, Cases Deficient in Serving Plaintiff Profile Forms

Number	Case Name	Plaintiff Firm(s)	Current Cause #
35	Leber, June	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08934
36	Bell, Lekisa	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-08944
37	Peterson, Karen Jean	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09018
38	Jensen, Dagmar	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09050
39	Russo, Barbara	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09122
40	Mackey, Cora	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09144
41	Wright, Jeana	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09218
42	Rey-Molina, Berta	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09334
43	Meachem, Claudia	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09391
44	Elizardo, Vickie	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09628
45	Fisher, Brenda	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09632
46	Steen, Kevin	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09660
47	O'Brien, Patricia	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09788
48	Fritz, Elizabeth	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09819
49	Girado, Leticia	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-09824
50	Rucker, Harriett	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10009
51	Peters, Sherry	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10030
52	So, Paula	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10082
53	Stewart, Susan	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10086
54	Wilburn, Lisa	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10199
55	Stroud, Sarah	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10216
56	Stettner, Daniel	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10220
57	Chambers, Vivian	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10223
58	Solis, Maria	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10250
59	Brown, Desiree	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10255
60	Cross, Veda	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10278
61	Hancock, Karen	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10303
62	Buda, Kathy	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10306
63	Dempsey, Kori	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10333
64	Findley, Shawn	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10352

# Case 3:16-md-02738-MAS-RLS Document 29168 Filed 03/01/24 Page 5 of 8 PageID: 174116 March 1, 2024, Cases Deficient in Serving Plaintiff Profile Forms

Number	Case Name	Plaintiff Firm(s)	Current Cause #
65	Reynolds, Lori	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10361
66	Frederick, Alicia	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10364
67	McDowell, Tamara	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10383
68	Lane, Vera	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10406
69	Williams, Carolyn D	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10453
70	Reddix, Sherri	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10481
71	Rathbone, Christopher	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10553
72	McClendon, Carolyn	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10567
73	Kimmel, Patricia	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10575
74	Mason, Ruby	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10579
75	Roman, Ermelinda	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10590
76	Frazier, Allen	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10804
77	Grunden, Ken	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10806
78	Sullivan, William	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10812
79	Frost, Ellen	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-10878
80	McNeill, Diane	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-12812
81	Neff, Elizabeth	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-13607
82	Maly, Gayle	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.	3:17-cv-13752
83	Rappold, Allan	Jim S. Hall & Associates, LLC	3:17-cv-04596
84	Robb, Mary	Burch & George // Sill Law Group, PLLC // White & Weddle, P.C. // Zelbst Holmes & Butler	3:16-cv-06608
85	Talbott, Sheri	Burns Charest LLP	3:17-cv-06078
86	Rice, Renna	Burns Charest LLP	3:17-cv-12283
87	McDeavitt, Cynthia	Burns Charest LLP // Burns Charest LLP	3:17-cv-07283
88	Clark, Patricia	Burns Charest LLP // Burns Charest LLP	3:17-cv-05696
89	Todd, Emma Jean	Burns Charest LLP // Burns Charest LLP	3:17-cv-07094
90	Williams, Sandra (07994)	Burns Charest LLP // Burns Charest LLP	3:17-cv-07994
91	Maldonado, Velsa	Burns Charest LLP // Burns Charest LLP	3:17-cv-08279
92	Dawson, Scott	Burns Charest LLP // Burns Charest LLP // The Pate Law Firm	3:16-cv-08749
93	Smith, Deanna	Cates Mahoney, LLC	3:17-cv-10747
94	Wood, Amy Rebecca	Clark, Robb, Mason, Coulmbe Buschman & Charbonnet	3:16-cv-07986
95	Collins, Thomas Michael	Conley Griggs Partin LLP	3:17-cv-13253

# Case 3:16-md-02738-MAS-RLS Document 29168 Filed 03/01/24 Page 6 of 8 PageID: 174117 March 1, 2024, Cases Deficient in Serving Plaintiff Profile Forms

Number	Case Name	Plaintiff Firm(s)	Current Cause #
96	Dineyazhe, Rosanna	Diamond Law	3:17-cv-13164
97	Skomp, Anna	Diamond Law	3:17-cv-13188
98	Lupe, Lavinia	Diamond Law	3:17-cv-3965
99	Strukel, Christy	Dugan Law Firm, PLC	3:17-cv-07463
100	Davis, Patricia A.	Dugan Law Firm, PLC	3:17-cv-08095
101	Tuck-Lynn, Joyce	Eichen, Crutchlow, Zaslow & McElroy, LLP	3:17-cv-09339
102	Natera, Erica R	Eichen, Crutchlow, Zaslow & McElroy, LLP	3:17-cv-13546
103	Fowler, Karol	Fox and Farley	3:17-cv-08148
104	Breaux, Leslie	Galante & Bivalacqua LLC // Pourciau Law Firm, LLC // The Cheek Law Firm	3:17-cv-01681
105	Deville, Pamela	Galante & Bivalacqua LLC // Pourciau Law Firm, LLC // The Cheek Law Firm	3:17-cv-05636
106	Sondgerth, Lillian	Galante & Bivalacqua LLC // Pourciau Law Firm, LLC // The Cheek Law Firm	3:17-cv-05638
107	Bueno, Alicia	Girardi & Keese	3:17-cv-12500
108	Sanders, Margarette	Girardi & Keese	3:17-cv-12505
109	Blank, Angel Lucille	Girardi & Keese	3:17-cv-13795
110	Webb,Karyl	Goldenberg Law, PLLC	3:17-cv-07681
111	Michaelis, Linda	Goldenberg Law, PLLC	3:17-cv-07692
112	Davis, Shawn	Goldenberg Law, PLLC	3:17-cv-10175
113	Boos, Helen	Goldenberg Law, PLLC	3:17-cv-11143
114	Bentley, Cathleen	Goldenberg Law, PLLC	3:17-cv-11156
115	Ochoa, Delia	Goldenberglaw, PLLC	3:17-cv-10270
116	Hayes, Tammy	Golomb Spirt Grunfeld PC	3:17-cv-09727
117	Jackson, Thomas	Golomb Spirt Grunfeld PC	3:17-cv-10654
118	Ramos, Kim-Judith	Goza & Honnold, LLC	3:17-cv-02470
119	Barton, Elizabeth	Goza & Honnold, LLC	3:17-cv-12725
120	Treadwell, Linda	Hart McLaughlin & Eldridge	3:16-cv-09495
121	Lengele, Connie	Hart McLaughlin & Eldridge	3:17-cv-11319
122	White. Sheena	Hart McLaughlin & Eldridge	3:17-cv-11322
123	Storozyszyn, Jane	Hart McLaughlin & Eldridge	3:17-cv-11324
124	Sizemore, Robin	Hart McLaughlin & Eldridge	3:17-cv-11326
125	Seymour, Yokita	Hart McLaughlin & Eldridge	3:17-cv-11329
	Letourneaut, Magdalena	Hart McLaughlin & Eldridge	3:17-cv-11330
126	Sayegh, Cheryl	Hart McLaughlin & Eldridge	3:17-cv-11331
127	Hollifield, Sophie	Hart McLaughlin & Eldridge	3:17-cv-11333
128	Culley, Lisa	Hart McLaughlin & Eldridge	3:17-cv-11337
129	Benford, Ashley W.	Hart McLaughlin & Eldridge	3:17-cv-11339
130	Tabor, Sherry	Hart McLaughlin & Eldridge	3:17-cv-11344
131	McGee, Debra	Helmsdale Law, LLP	3:17-cv-05436
132	Santos, Ramon	Heygood, Orr & Pearson // The Miller	3:17-cv-13481
133	Saillus, Mailluii	Firm, LLC	J. 11-64-13401
134	Sanders, Sarah	Johnson Becker, PLLC	3:17-cv-11063
135	Segreaves, Julie	Keefe Bartels	3:16-cv-09119

# Case 3:16-md-02738-MAS-RLS Document 29168 Filed 03/01/24 Page 7 of 8 PageID: 174118 March 1, 2024, Cases Deficient in Serving Plaintiff Profile Forms

Number	Case Name	Plaintiff Firm(s)	Current Cause #
136	Jackson, Paula	Law Office of Eusi H. Phillips // Law Office of Marion D. Floyd	3:16-cv-07488
137	Matthews, Lauren	Law Office of John D. Sileo, LLC	3:16-cv-07490
138	Kruskall, Lauren S.	Law Offices of Kruskell	3:17-cv-05143
139	Brown, Bertha	Lenze Kamerrer Moss, PLC	3:17-cv-04340
140	Benson, Merritt	Martinian & Associates, Inc. // The Law Offices of Haytham Faraj	3:17-cv-07188
141	Hunt, Sylvia	Massimo & Pawetta, P.C.	3:17-cv-08070
142	Smith, Deborah	McGrath Law Firm PA	3:17-cv-02382
143	Allen, Theresa	Milberg Coleman Bryson Phillips Grossman, LLC	3:17-cv-12473
1.4.4	Nichols, Trisha Deann	Milstein, Jackson, Fairchild & Wade, LLP // The Michael Brady Lynch Firm	3:17-cv-13826
144	Collins, Nettie	Morris Bart, LLC	3:17-cv-03919
145	Cutrer, Charles	Morris Bart, LLC	3:17-cv-03919 3:17-cv-03920
146	Jackson, JoEva	Morris Bart, LLC	3:17-cv-03920 3:17-cv-03930
147	•	·	3:17-cv-03930 3:17-cv-03932
148	Jerro, Billy	Morris Bart, LLC	3:17-cv-03932 3:17-cv-03934
149	LaFleur, Phillip	Morris Bart, LLC	
150	Tauzier, Wayne	Morris Bart, LLC	3:17-cv-03941
151	Whitson, Richard	Morris Bart, LLC	3:17-cv-03943
152	McClanahan, Kenneth	Morris Law Firm	3:17-cv-10124
153	Vanderveer, Jennifer	Morris Law Firm	3:17-cv-10136
154	Schmitz, Daniel	Morris Law Firm	3:17-cv-10633
155	Albertine Jr, James Gary	Motley Rice, LLC	3:17-cv-02389
156	March, Calpricia	Motley Rice, LLC	3:17-cv-04855
157	Chanthapanya, Davahn	Motley Rice, LLC	3:17-cv-05853
158	Arenz, Dana	Motley Rice, LLC	3:17-cv-06074
159	Guidry, Mary	Motley Rice, LLC	3:17-cv-07260
160	Pimentel, Eleanor	Motley Rice, LLC	3:17-cv-07705
161	Molloy, Vicki	Motley Rice, LLC	3:17-cv-08514
162	Barber, Sonia T.	Motley Rice, LLC	3:17-cv-08594
163	Austin, Sheronda	Motley Rice, LLC	3:17-cv-10615
164	Hendon, John F.	Motley Rice, LLC	3:17-cv-11928
165	Hunsaker, Pamela	Motley Rice, LLC	3:17-cv-12059
166	Douglas, Maureen S.	Motley Rice, LLC	3:17-cv-12296
167	Luna, Jessica Nicole	Motley Rice, LLC	3:17-cv-12324
168	Schapiro, Liqun Y	Motley Rice, LLC	3:17-cv-12726
169	Mancini, Eleanor	Napoli Shkolnik, PLLC	3:17-cv-12662
170	Cook, Jerry	Napoli Shkolnik, PLLC	3:17-cv-12703
171	Gadfield, Robert	Napoli Shkolnik, PLLC	3:17-cv-12704
172	Doyle, Renee	Napoli Shkolnik, PLLC	3:17-cv-12715
173	Fierro, James	Napoli Shkolnik, PLLC	3:17-cv-12716
174	Christian, Patricia	Napoli Shkolnik, PLLC	3:17-cv-12719
175	Brigman, Barbara	Poulin, Willey, Anastopoulo, LLC // Steckler Gresham Cochran	3:17-cv-08135
176	Ikemoto, Joan Lee	Poulin, Willey, Anastopoulo, LLC // Steckler Gresham Cochran	3:17-cv-08141

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Number	Case Name	Plaintiff Firm(s)	Current Cause #
177	Lovato, Angela	Pro Se	3:16-cv-07427
178	Smoller, Lorraine	Pro Se	3:16-cv-07427
179	Francis, Philip	Remer & Georges-Pierre, PLLC	3:16-cv-07530
180	Ewing, Marisa	Robinson, Calcagnie, Robinson, Shapiro, Davis, Inc.	3:17-cv-09614
181	Ford, Teresa	Ross Feller Casey, LLP	3:17-cv-02370
182	Dalton, Connie	Ross Feller Casey, LLP	3:17-cv-09074
183	Sherlock, Tina	Sangisetty Law Firm, LLC	3:17-cv-02751
184	Eidson, Carol	Sangisetty Law Firm, LLC	3:17-cv-02753
185	Callies, Raenell	Shaw Cowart, LLP	3:17-cv-13012
186	Shackelford, Michael	Sill Law Group, PLLC	3:17-cv-00040
187	Ashlock, Leon	Sill Law Group, PLLC	3:17-cv-11080
188	Bradley, Marcie	Sill Law Group, PLLC	3:17-cv-11081
189	Bowling, Oleita	Sill Law Group, PLLC	3:17-cv-11082
190	Ashford, Shirley Jean	Sill Law Group, PLLC	3:17-cv-11083
191	Allee, Ila	Sill Law Group, PLLC	3:17-cv-11084
192	Gill, James	Sill Law Group, PLLC	3:17-cv-11086
193	McCorkle, Patricia	Sill Law Group, PLLC	3:17-cv-11087
194	Cagle, Cindy	Sill Law Group, PLLC	3:17-cv-12729
195	Yandell, Carol A	Simmons Hanly Conroy	3:17-cv-04414
196	Bullock, Cardell	Simmons Hanly Conroy	3:17-cv-05779
197	Rosensteel, Crystal M	Simmons Hanly Conroy	3:17-cv-05781
198	Brown, Sharon	Simmons Hanly Conroy	3:17-cv-11231
199	Mojica, Kristin	Steckler Gresham Cochran	3:17-cv-08455
200	Burroughs, Remona	Steckler Gresham Cochran	3:17-cv-08476
201	Tolliver, Paul	Steve Merritt Law	3:17-cv-02976
202	Weseman, Linda	Stewart & Stewart	3:17-cv-01119
203	Roberts, Sylvia	Stewart & Stewart	3:17-cv-02890
204	Isaacs, Victor	Summers & Johnson, P.C.	3:17-cv-11676
205	Bustos, Arthur L.	The Alarid Law Firm, P.C.	3:17-cv-08290
206	Vinton, Stephanie	The Dugan Law Firm, APLC	3:17-cv-07777
207	Fiordiliso, Jeanna	The Levensten Law Firm, P.C.	3:17-cv-05652
208	Cubbage, Kathy Ann	The Miller Firm, LLC	3:17-cv-12877
209	Pringle, Maryladene	The Simon Law Firm, PC	3:17-cv-06766
210	Demelia, Maylou	The Simon Law Firm, PC	3:17-cv-10971
211	Smith, Cassie	The Simon Law Firm, PC	3:17-cv-11212
212	Link, Mona	Wagstaff & Cartmell, LLP	3:17-cv-04591